



STEVEN C. McCRAW
DIRECTOR
DAVID G. BAKER
ROBERT J. BODISCH, SR.
DEPUTY DIRECTORS

TEXAS DEPARTMENT OF PUBLIC SAFETY

5805 N LAMAR BLVD • BOX 4087 • AUSTIN, TEXAS 78773-0001
512/424-2000
www.dps.texas.gov



COMMISSION
A. CYNTHIA LEON, CHAIR
MANNY FLORES
FAITH JOHNSON
STEVEN P. MACH
RANDY WATSON

October 02, 2014

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the matter of)
)
Request for Certification as a Frequency) PS Docket No. 14-148
Coordinator for PLMR VHF, UHF, 700 MHz)
800 MHz Public Safety Frequencies by ACD)
Telecom, LLC)

Comments of The State of Texas

The Texas Department of Public Safety hereby submits the following comments in response to the Commission's Request for Comments, PS Docket No. 14-148, released September 8, 2014 in the above-captioned proceeding regarding ACD Telecom, LLC's (ACD) request to be certified to coordinate public safety frequencies under Part 90 of the Communication's Rules.

ACD Telecom, LLC a telecommunications firm headquartered in Lake Mary Florida has asked to be certified by the FCC as a national Public Safety frequency coordinator. ACD appears to be a telecommunications consulting firm specializing in public safety communications. ACD seemingly has no current direct involvement with any Public Safety organization other than for profit activities.

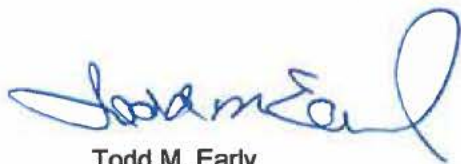
Currently the four standing Frequency Coordinators represent some segment of the Public Safety community as their primary responsibility. We have seen no indication that ACD has any such protected group to represent. If they do, they did not include them in their filing to the FCC.

The four current frequency coordinators have a long history of cooperation and interdependence on technical issues through their membership in the Land Mobile Communications Council (LMCC). A best practice to be a Public Safety frequency coordinator would be to work with and become a member of the LMCC. We understand that ACD is not a member of and has not requested to be a member of the LMCC.

One of the primary objectives of the current frequency coordination system is to ensure that the incumbent licenses are protected as much as possible from interference from licensees. Nothing in their application to be a coordinator speaks to how they would handle interference complaints. Their document speaks to "post-licensing conflicts involving frequency selection". Some interference complaints have nothing to do with frequency selection yet still need technical help from a coordinator.

ACD proposes to add frequency coordination in addition to their existing consulting services. This would make it possible for a single entity to offer all the levels of communications system consulting from system design, license preparation and coordination services. This would create an opportunity for conflict of interest with the best interest of the Public Safety customer being lost in the process.

Opening the door for an additional coordinator could set a precedent for other consulting entities to try and become Public Safety Frequency coordinators. The current system of four frequency coordinators, each managing their section of the spectrum, has worked well for many years and there hasn't been any movement for change from the Public Safety Community. Based on the above reasons, we do not recommend any additional national Public Safety Frequency Coordinators.



Todd M. Early
Deputy Assistant Director
Statewide Interoperability Coordinator
Public Safety Communications / Law Enforcement Support Division
Texas Department of Public Safety